

Hi Julie,

I believe we met once or twice at some water related function on southern or northern California. I wanted to email you in regards to the proposed MWELO regulations that DWR has been tasked to consider modifying.

I have a very long history in the water management side having both successfully operated central control for large projects, provide sales and support for many large and small private and public institutions and agencies, as well as consult with numerous customer types on improving water efficiencies and management. As you know, the primary weakness has been the management side of our industry. We are a dumb trade that forces upon the least skilled model to manage systems that are effectively designed with efficient products - both with products installed in the field and products designed to help manage those products in the field. That is a California issue because the trend is to hire the least expensive firm and have little regard for water rates that have always been too low. Perhaps that may not change unless we force upon existing customer to pay the penalty for having turf in locations where the only people walking on are those maintaining it and increase rates. It has worked in the past and continues to work - as you know, in the Irvine Ranch and other surrounding Districts using similar models.

As we speak, the most effective models today are effective design, implementation by those who do the designs and contractors willing to follow the proper design, AB 1881 requirements to tighten up the rules a bit, and more recently, the turf removal program. If there is anything that I have seen taking the biggest chunk out of water use is the incentive program that MWD has been willing to fund. I am smack dab in the middle of this as we speak. Water is cheap, users have limited financial incentive to progress. Help them get there and they have responded. If the data is correct, 127 million sq. ft of turf will be turned over by this year. We have billions more to go, but the significance of this will pay huge dividends forever.

Modifying statewide efficiency programs such as what is proposed is unfair, unattainable, and unrealistic. They conflict with everything the DWR has been trying to promote for the past decade. Making harsh decisions at this juncture is going to be harmful both economically, and irresponsible without more studies to evaluate continued progress that California, more than any other State, has made in the history of irrigation.

The design firms (and I work with just about every firm in California) has made tremendous strides in taking a honest and effective approach to ensuring that the rules are met and progress made. Let them do what they do and know best - design efficient systems. For the commercial irrigation target, let water based budget irrigation be a more logical choice.

The State should also look hard at agricultural irrigation incentives and practices to make the real dent in this. I love the farmer, but try reduce the amount of flood irrigation and provide funding to support change. Get the State to help their own agencies play their part as well - I work them, they don't have any more incentive than anyone else. Holy smoke, have you seen how Caltrans manage water - I work with them everyday. Limit planting on freeways if you want to see some mass change.

Increase funding to develop reclaimed water system infrastructure and replenishment plants.

These are things that will ensure future water, not making unscientific changes to uniformities, and efficiencies that puts all the burden on the private sector. They are the real heroes for doing some many things to effect change - because their livelihood depends on pushing the needle forward. Pushing them too hard and they will leave the State, and leave the technology that California is so well known for achieving for the past 30 years.

In summary, if turf incentives continue, reduction in existing turf will go way beyond water..You'll see reduced gas usage and pollution, granular fertilizer use will drop significantly, liability will be minimized due to less vehicle activity, green waste will be reduced from turf, maintenance profits will increase due to reduced labor, gas, repairs, etc., and

costs will go down for hundreds of thousand of customers and users all because turf is reduced where is useless or non-effective.

Thanks for your time.

Daryl Green  
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